

CERTIFICATE OF COMPLIANCE

No.

PHILIP SNYDER

Petitioner

v.

TENTH PRESBYTERIAN CHURCH

Respondent

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of *certiorari* contains 4,053 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 27, 2022.



FAYE RIVA COHEN, ESQUIRE
COUNSEL FOR PETITIONERS